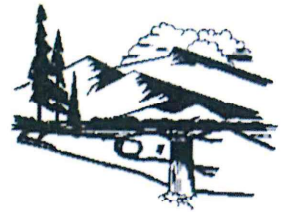




Department of Environmental Quality

*To protect, conserve and enhance the quality of Wyoming's
environment for the benefit of current and future generations.*



Matthew H. Mead, Governor

Todd Parfitt, Director

August 10, 2018

Melissa Martin
Project Manager
U.S. Forest Service
Medicine Bow-Routt National Forest

Via: mmmartin@fs.fed.us

Re: Medicine Bow Landscape Vegetation Analysis Project Draft EIS

Dear Ms. Martin,

Thank you for the opportunity to provide comments on the draft Environmental Impact Statement (EIS) for the Medicine Bow Landscape Vegetation Analysis Project (Project). The Wyoming Department of Environmental Quality (WDEQ) – Water Quality Division (WQD) is responsible for protecting surface water and groundwater quality in the State of Wyoming and therefore takes an interest in the potential impacts of the Project to water resources. Please accept the following comments on the draft EIS on behalf of the WQD:

Chapter 2; Page 53; Hydrology and Soils – Effects from MPA: The last sentence in the second paragraph states “Projections show that this alternative would result in water quality effects from 372 miles of temporary roads, 12,068 acres of mechanical treatment and 6,583 acres of fuel treatments.” WDEQ/WQD recommends that the EIS clarify whether these values represent road miles and acreages within 300 feet of waterbodies or some other area.

Chapter 2; Page 56; Equivalent Clearcut Area – Alternative 2 – MPA: WDEQ requests that the EIS clarify whether ECA values for each 6th level watershed will be calculated after each project is completed or at some other time period (e.g., ECA values calculated annually or biannually, every five years, etc.).

Chapter 3; Page 160; Monitoring: The WDEQ acknowledges that the 25% ECA cap for 6th-level watersheds is intended to prevent degradation of streams due to increased erosion and runoff associated with cumulative reductions in watershed vegetative cover. As currently drafted, the EIS does not describe any monitoring that will be conducted to evaluate physical impacts to stream health (i.e., geomorphology) that may occur as a result of cumulative reductions in watershed vegetative cover. Due to the inherent variability in and sensitivity of various stream segments and watersheds, WDEQ recommends that the EIS clarify how the 25% ECA will be sufficiently protective of all stream types.

Attachment 3; Page 238; Hydrology and Wet Areas: Additional design features mentioned in the National BMPs for Water Quality Management in National Forests (National BMPs) could be incorporated to protect Hydrology and Wet Areas, including: (1) Plan and locate surface water crossings to limit the number and extent to those that are necessary to provide the level of access needed to meet resource management objectives; (2) Use suitable measures to avoid or minimize scour and erosion of the channel, crossing structure, and foundation to maintain the stability of the channel and banks.

Attachment 3; Page 242; Erosion Control: Additional design features mentioned in the National BMPs could be incorporated to improve Erosion Control, including: (1) Use suitable measures to disperse concentrated flows of water from road surface drainage features to avoid or minimize surface erosion, gully formation, and mass failure in water influence zone and sediment transport to adjacent waterbodies; (2) Install sediment and stormwater controls before initiating surface-disturbing activities to the extent practicable.

We thank you for the opportunity to provide input. Please contact Brian Hall, Outreach Program Manager (brian.hall@wyo.gov; 307-777-7753) for questions regarding our comments.

Sincerely,



Todd Parfitt
Director